

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.)
)
 1. ANGEL GONZALEZ,)
 AKA "KING A-SHOT", AND)
)
 2. JOSE GONZALEZ,)
 AKA "KING STRIKE", AKA)
 "TITO")
)

CR. NO. 04-10046-RGS

JOINT INITIAL STATUS REPORT

The United States of America and the defendants, Angel Gonzalez and Jose Gonzalez, by their respective undersigned counsel, submit this joint status report pursuant to Local Rule 116.5(A).

1. Local Rule 116.3 Timing Requirements

At this time the parties do not seek relief from the timing requirements imposed by L.R. 116.3.

2. Expert Discovery

The government anticipates that, unless there is a stipulation regarding the controlled substance involved in this case, it will offer expert testimony regarding the cocaine and cocaine base seized in this case. The defendants reserve their respective rights to seek such discovery.

3. Additional Discovery

Rule 16 and automatic discovery materials have been provided or made available to defendants' respective counsel. In the event that the government becomes aware of any additional Rule 16

and/or automatic discovery material, it will immediately provide such material to counsel for the defendants.

4. Motion Date

The government requests that all motions be filed on or before June 2, 2004, and any responses be served by June 16, 2004. Defendants request that an interim status conference be scheduled for on or about June 2, 2004, and that no motions deadline be set at this time.

5. Speedy Trial Act

The parties have conferred on the periods excludable from all Speedy Trial Act calculations and believe that the following periods are excludable:

2/24/04-4/13/04 Govt's motion for detention; Order on government's motion for detention

4/21/04-date of Excluded as set forth above
Final status

As of the Final Status Conference, 7 days will have been counted and 63 days will remain under the Speedy Trial Act.

6. Anticipated Trial

It is too early to tell whether a trial will be needed in this matter. The United States estimates that a trial would last approximately 4 days.

7. Final Status Conference

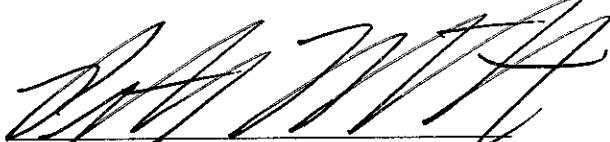
The government requests that a Final Status Conference be scheduled for June 16, 2004, or as soon thereafter as is

convenient for the Court. Defendants request that an interim status conference be scheduled for on or about June 2, 2004.

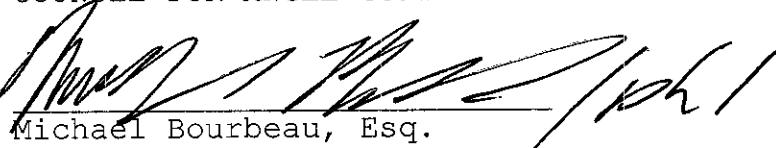
Respectfully submitted,

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April 21, 2004